

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Deshawnda L. Williams :
Debtor : BANKRUPTCY NO.: 20-10630-AMC

RESPONSE TO MOTION FOR RELIEF

Debtor, by their attorney, Brandon J. Perloff, Esq., of Brandon Perloff, P.C., by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. Movant's averment refers to documents on record before the Court.

The Debtor does attest to the authenticity or veracity of said documents. Said documents speak for themselves.

4. Admitted.
5. Admitted.
6. Denied. To the contrary, the Debtor sent payments for the months of February,

2020 and March, 2020. When the Debtor attempted to confirm receipt of these payments, she was told by the Movant or the Movant's representative that there was no record of these payments. Additionally, she was advised that, due to the COVID 19 pandemic, the Movant's ability to look into this matter further was limited as most staff were working remotely. The Debtor was concerned that her regular monthly mortgage payments were not being appropriately credited to her account. Therefore, in an effort to prevent any additional future payments from being misplaced, lost or misapplied, she set each monthly payments aside pending the resolution of this matter. However, despite the Debtor's efforts, the payments were never located.

7. Denied. After reasonable investigation, Debtor is without knowledge or information sufficient to form a belief as the truth of Movant's averment.

8. Denied. The Debtor denies the accuracy of the amount listed in Movant's corresponding paragraph. The Debtor sent payments, that have not been credited to her account. She is currently tracking said payments.

9. Denied. Movonats averment is a conclusion of law to which no response is required.

10. Movant's averment does not call for a response.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Dated: November 17, 2020

/s/Brandon Perloff

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